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January 7, 2022

Via PACER

Honorable Jesse M. Furman United States District Court – Southern District

Re: Flores et al v. Boro Concrete Corp. et al

1:21-cv-05006-JMF Joint Letter Motion

Dear Judge Furman:

This office represents Defendants, Boro Concrete Corp, Martin Moore and Eric Chavez in the above referenced action.

I am writing this joint letter with Plaintiffs' counsel's consent to request that the Plaintiffs' Motion for Default against Defendants be withdrawn without prejudice as the parties have agreed to allow Defendants to file an Answer. In addition, the parties have agreed to allow Defendants to file an Answer on or before January 14, 2022 at 5pm.

As such, it is respectfully requested that Your Honor grant this joint letter motion. Thank you for your attention to this matter.

Very truly yours,

Timothy Kilgannon, Esq.

Timothy Kilgannon

Cc: Via PACER – Plaintiffs' counsel

Application GRANTED. The Clerk of Court is directed to terminate ECF Nos. 24 and 39.

January 7, 2022